

**ROCKY FLATS ENVIRONMENTAL
TECHNOLOGY SITE**

**ERPD ADMINISTRATIVE
PROCEDURES MANUAL
CATEGORY 1**

Manual No.:

**2-11000-ER-ADM
(a.k.a. 3-21000-ADM)**

Procedure No.:

Table of Contents, Rev 28

Page:

1 of 2

Effective Date:

12/16/94

Organization:

Environmental Restoration

**TABLE OF CONTENTS FOR
ENVIRONMENTAL RESTORATION PROGRAM DIVISION
ADMINISTRATIVE PROCEDURES MANUAL**

Procedure No.	Title	Rev. No.	Effective Date
01.01	ER Organization		
02.01	2-F94-ER-ADM-02.01 - Training	1	12/01/94
02.02	Personnel Qualifications	0	08/15/91
03.04	Control of QAA Development	0	09/23/91
04.01	Procurement Document Control	0	04/08/92
05.01	2-E95-ER-ADM-05.01 - Procedure Development	1	06/01/94
94-DMR-001227	Appendix Replacement	1	07/05/94
05.03	RFI/RI Work Plan Development	0	08/15/91
94-DMR-002179	Extension of DCN 93.01	0	11/23/94
05.05	2-E02-ER-ADM-05.05 - Document Review	1	06/01/94
94-DMR-002108	DOE/RFFO Review Determination Inclusion	1	12/01/94
94-DMR-002218	Allowance of Delays for Late Comments	1	12/01/94
05.07	2-E04-ER-ADM-05.07 - Environmental Restoration Program Division (ERPD) Preparation and Use of Document Modification Requests	2	10/07/94
94-DMR-002219	ERPD Training Process Facilitation	2	12/01/94
05.08	Forms Control	0	09/23/91
05.10	2-G06-ER-ADM-05.10 - Control of Scientific Notebook Systems	0	07/15/94
05.11	Preparation of Instructions	0	04/08/92
06.01	Document Control	0	08/02/91

**DOCUMENT CLASSIFICATION
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ADMINISTRATIVE

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**ROCKY FLATS ENVIRONMENTAL
TECHNOLOGY SITE****ERPD ADMINISTRATIVE
PROCEDURES MANUAL
CATEGORY 1****Manual No.:****2-11000-ER-ADM****(a.k.a. 3-21000-ADM)****Procedure No.:****Table of Contents, Rev 28****Page:****2 of 2****Effective Date:****12/16/94****Organization:****Environmental Restoration**

Procedure No.	Title	Rev. No.	Effective Date
06.04	2-N93-ER-ADM-06.04 - Map Control	0	10/31/94
08.01	Control and Identification of Items, Samples, and Data	0	04/08/92
08.02	2-G32-ER-ADM-08.02 - Evaluation of ERM Data for Usability in Final Reports	0	10/21/94
94-DMR-001986	Laboratory Detection Limit	0	10/21/94
08.03	2-J77-ER-ADM-08.03 - Graded Validation	0	11/10/94
08.05	2-J76-ER-ADM-08.05 - Contract Compliance Screening	0	11/10/94
10.01	Inspections	0	04/08/92
12.01	Control of Measuring and Test Equipment	0	04/08/92
15.01	Control of Nonconforming Items and Activities	1	10/12/92
16.01	Corrective Action	0	04/08/92
17.01	2-G18-ER-ADM-17.01 - Records Capture and Transmittal	0*	10/31/94
*This revision supersedes procedure 3-21000-ADM-17.01 Revision 0.			
17.02	Administrative Records Screening and Processing	0	12/07/92
17.09	2-N96-ER-ADM-17.09 - Records Identification, Preliminary Preparation, and Creation	0	10/31/94
18.02	Surveillance Activities	1	04/08/92
18.03	2-G21-ER-ADM-18.03 - Readiness Assessments	1	08/24/94
•94-DMR-002243	Training & Records Corrections and Editorial Changes	1	12/16/94
•94-DMR-002293	Clarification of Category 3 Assessment	1	12/16/94
18.05	2-G23-ER-ADM-18.05 - Environmental Restoration Management Self Evaluation	0	07/15/94
AQD.08	Preparation of EPA Form R	1	10/10/91

LIST OF EFFECTIVE PAGES

<u>Pages</u>	<u>Effective Date</u>	<u>Change Number</u>
1-39	08/24/94	
3, 5-6, 8-11, 13-18, 23-25	12/16/94	94-DMR-002243
5, 5A, 7	12/16/94	94-DMR-002243

TOTAL NUMBER OF PAGES: 39

DOCUMENT MODIFICATION REQUEST (DMR)

PAGE 1 of 23 98
12/13/94

Refer to 1-A01-PPG-001 for Processing Instructions.
Print or Type All Information (Except Signatures).

1. Date

December 8, 1994

DMR No. 94-DMR-002293

2. Existing Document Number/Revision

G21-ER-ADM-18.03 / 01 98

3. New Document Number or Document Number if it is to be changed with this Revision

N/A

4. Originator's Name/Phone/Pager/Location

D. S. Brown / x8745 / d5244 / Bldg. 080

5. Document Title

Environmental Restoration Program Division
Readiness Assessments

6. Document Type

☒ Procedure☐ Other

7. Document Modification Type (Check only one)

CCCB Review not required.

☐ New ☐ Revision ☒ Intent Change ☐ Nonintent Change ☐ Editorial Correction ☐ Cancellation

8. Item 9. Page 10. Step

11. Proposed Modifications

1

5

\$2

Change the wording of the first sentence in the first paragraph of Section 2, Scope, to read:
"This procedure applies to ERPD-controlled non-nuclear and appropriately determined Category 3 (low hazard) nuclear facilities/activities at RFETS ..."

2

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\$2

Change the wording of the second sentence in the third paragraph of Section 2, Scope, to read:
"... is classified as nuclear, this procedure shall defer to the Readiness Determination Checklist and instructions found in 1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities. If the Determination Checklist indicates that a Low Hazard Readiness Assessment (LHRA) is appropriate, then this ERPD procedure may be implemented."

12. Justification (Reason for Modification, EJO #, TP #, etc.)

These changes are required to clarify under what conditions the ERPD Readiness Assessment process may be implemented for the assessment of Category 3 (low hazard) nuclear facilities; and to clarify that the ERPD procedure complies with the graded approach assessment requirements for such facilities as stated in DOE Order 5480.31; and, to clarify that the ERPD procedure is in concert with 1-H24-ADM-10.01 relative to assessments of Category 3 (low hazard) facilities.

If modification is for a new procedure or a revision, list concurring disciplines in Block 13, and enter N/A in Blocks 14 and 15. If modification is for any type of change or a cancellation, organizations are listed in Block 13, then Concuror prints, and signs in Block 14, and dates in Block 15.

13. Organization	14. Print, Sign (if applicable)	15. Date (if applicable)
DM&RS	<i>D. S. Brown</i> K. BEUTZEN	12-12-94
EOM	<i>M. C. Broussard</i> M. C. BROUSSARD	12-12-94
OU4	<i>Donald A. Ringle</i> J. R. KEITH D.A. RINGLE	12-12-94
Group 1	<i>A. L. Primeose</i> A. L. PRIMEOSE	12-12-94
IAOUs & D&D	<i>B. D. Petermann</i> B. D. PETERMANN	12-12-94
OU 2	<i>W. S. Busby</i> W. S. BUSBY	12-12-94
OU 5, 6, 7	<i>EC Mast</i> 12/12/94	12/12/94
Perf. Assur.	N/A - see fax M. Collins to K. Taylor, Nov. 30, 1994	

16. Originator's Supervisor (print/sign/date)

M. C. Broussard

12-12-94

17. Signed SME/Phone/Pager/Location

S. Brown / x8745 / d5244 / Bldg. 080

18. Cost Center

0248

19. Charge Number

989347-00

20. Requested Completion Date

December 16, 1994

21. Effective Date

12/16/94

22. Accelerated Review?

Yes ☐ No ☒

23. ORC Review

ORC review NOT required

24. Responsible Manager (print/sign/date)

M. C. Broussard

12-12-94

DMR (continuation sheet)

Page 2 of 23

Refer to 1-A01-PPG-001 for Processing Instructions.
Print or Type All Information (Except Signatures).

25. DMR No. 94-DMR-002293

Document Number/Revision

2-G21-ER-ADM-18.03 / 01

5. Document Title

Environmental Restoration Program Division
Readiness Assessments

8. Item	9. Page	10. Step	11. Proposed Modifications
3	7	§3.1	<p>Change the second bullet, to read:</p> <p>"A primary objective . . . versus non-nuclear activities. While this procedure is directed primarily at compliance with DOE Order 5481.1B, Safety Analysis and Review System, it is also intended to comply with the requirements of DOE Order 5480.31, Startup and Restart of Nuclear Facilities, as they are applicable to Category 3 (low hazard) nuclear facilities. In accordance with the definitions . . . not, generally, defined as nuclear. Appendix 2 of this procedure . . . to the provisions of DOE Order 5480.31."</p> <p>No training required.</p>

12. Justification (Reason for Modification)

These changes are required to clarify under what conditions the ERPD Readiness Assessment process may be implemented for the assessment of Category 3 (Low Hazard) nuclear facilities; and to clarify that the ERPD procedure complies with the graded approach assessment requirements for such facilities as stated in DOE Order 5480.31; and, to clarify that the ERPD procedure is in concert with 1-H24-ADM-10.01 relative to assessments of Category 3 (Low Hazard) facilities.

1. **PURPOSE**

This procedure defines the methods and responsibilities for conducting Readiness Assessments (RAs) by describing the steps used to obtain appropriate authorization for, and ensure appropriate control of, activities conducted by EG&G Rocky Flats, Inc. (EG&G) Rocky Flats Environmental Technology Site (RFETS) Environmental Restoration Program Division (ERPD). When performed, RAs provide the means for verifying and documenting that specified prerequisites and requirements have been satisfied and that a facility, system, or process (including a field activity) is ready to safely operate, restart, occupy, or proceed to the next phase, such as from planning to the initiation of a site investigation or to remediation.

2. **SCOPE**

This procedure applies to ERPD-controlled non-nuclear and appropriately determined Category 3 (low hazard) nuclear facilities/activities at RFETS, and particularly to ERPD activities discussed in the Statement of Work in the Final Environmental Restoration Interagency Agreement (IAG), and to other activities that may be designated. Specifically, RAs are performed before the initiation of work under any Operable Unit (OU) or any other field activity to include, but not be limited to, Resource Conservation and Recovery Act (RCRA) Facility Investigation/Remedial Investigation (RFI/RI) work plans (WPs), baseline risk assessments, treatability studies, remediation tasks, accelerated cleanup projects, decontamination and decommissioning activities, or any other activity designated by a Responsible Manager (RM).

This procedure addresses the following topics:

- Initiating an RA
- Preparing the RA Notice
- Developing the Checklist
- Resolving Checklist Comments
- Verifying the Checklist (conducting the RA)
- Preparing and Issuing the Evidence of Readiness Report
- Closing Poststart Open Items

If another type of readiness review or readiness assessment is required by a higher-level procedure, this procedure does not supersede the higher-level procedure. Specifically, if the completion of Appendix 2, the Readiness Assessment Worksheet (RAW), indicates that the subject activity is classified as nuclear, this procedure shall defer to the Readiness Determination Checklist and instructions found in 1-H24-ADM-10.01, Startup and Restart of Nuclear Facilities. If the Determination Checklist indicates that a Low Hazard Readiness Assessment (LHRA) is appropriate, then this ERPD procedure may be implemented. However, the Manager, Environmental Operations Management (EOM) may require implementation of this procedure even if another type of readiness review or readiness assessment is to be done or is required by a higher-level procedure.

This procedure applies to all EG&G employees and subcontractors participating in ERPD activities. An RA may also be conducted for activities in support of agency-directed research and development and technology demonstrations.

3. OVERVIEW (continued)

Finally, this procedure describes the administrative process by which an activity authorization is provided and documented, following successful closure and verification of Checklist items. Appendix 1, ERPD Readiness Assessment Flow Chart provides an overview of the RA process.

3.1 Issues Addressed in Developing This Procedure

In the complex and dynamic ERPD operating environment, RMs need assistance with determining the applicability of numerous internal and external compliance requirements. A number of established sitewide programs may also impact the preparations for operations. The RA process and the Checklist, in addition to documenting readiness, are intended to provide a planning tool rather than present a last minute administrative frustration. The following objectives summarize the primary issues addressed:

- The ERPD RA process is not intended or designed to reevaluate preexisting programmatic elements. The objective is to employ a graded approach. This approach connotes a risk-based methodology for analyzing work activities that determine the degree of rigor and appropriate type of control required to optimize employment of human and material resources while meeting applicable standards and requirements. This objective also embraces the concept that if, for example, an Integrated Work Control Program (IWCP) package is required and approved, verification of such approval is accepted as constituting compliance with the requirements incumbent in that program.
- A primary objective of the ERPD RA process is to facilitate appropriate distinctions between readiness reviews of nuclear versus non-nuclear activities. While this procedure is directed primarily at compliance with DOE Order 5481.1B, Safety Analysis and Review System, it is also intended to comply with the requirements of DOE Order 5480.31, Startup and Restart of Nuclear Facilities, as they are applicable to Category 3 (low hazard) nuclear facilities. In accordance with the definitions in DOE Order 5480.31 and the thresholds for radionuclides listed in Table A.1 of DOE-STD-1027-92, Hazard Categorization and Accident Analysis Techniques for Compliance with DOE Order 5480.23, Nuclear Safety Analysis Reports, ERPD facilities and activities are not, generally, defined as nuclear. Appendix 2 of this procedure makes provision for identifying those ERPD activities that might be defined as nuclear and, therefore, be subject to the provisions of DOE Order 5480.31.
- The objective is to involve the RM early in the RA process, taking advantage of project knowledge to help ensure the proper content and rigor for the RA.

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